1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 NO. C17-1354 RSM ARLENE M. BROWN, 10 STIPULATED MOTION FOR Plaintiff. **KTENSION OF TIME TO RESPOND TO** 11 PLAINTIFF'S COMPLAINT v. 12 AND ORDER THE BOEING COMPANY, EMPLOYEE 13 BENEFITS PLANS COMMITTEE, 14 Defendants. 15 16 17 **STIPULATION** 18 19 20 21

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to extend the deadline for Defendants to respond to Plaintiff's Complaint, which was filed in this Court on September 8, 2017. (Dkt. #1). Absent an Order extending the deadline to respond to Plaintiff's Complaint, Defendants' responses would be due on October 2, 2017. Plaintiff's Complaint is 18 pages long and contains a variety of factual and legal allegations spanning many years and referencing multiple pension plans and other documents. Defendants would greatly benefit from a modest extension of the response deadline to allow them to thoroughly investigate Plaintiff's allegations. Plaintiff has graciously agreed with Defendants' request to extend the response deadline to October 31. The parties, therefore, join in asking the Court to extend the deadline for Defendants to file and serve responses to Tuesday, October 31, 2017.

STIP. MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT - (17-CV-01354 RSM) - 1

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1 IT IS SO STIPULATED. 2 3 DATED this 28<sup>th</sup> day of September, 2017. 4 FOX ROTHSCHILD LLP 5 6 7 s/Arlene M. Brown (with permission) s/Laurence A. Shapero Arlene M. Brown, Pro Se Laurence A. Shapero, WSBA #31301 8 Robert M. Howie, WSBA #23092 239 SW 189th Pl Normandy Park, WA 98166 Fox Rothschild LLP 9 1001 Fourth Avenue, Suite 4500 Phone: 206-431-8693 Email: pensionrights707@gmail.com Seattle, WA 98154 10 Telephone: 206.624.3600 **Plaintiff** 11 Facsimile: 206.389.1708 Email: lshapero@foxrothschild.com 12 Emily Glunz, pending pro hac vice 13 Deborah Davidson, pending pro hac vice Morgan Lewis & Bockius LLP 14 77 West Wacker Drive, Fifth Floor 15 Chicago, IL 60601 Telephone: 312-324-1000 16 Facsimile: 312-324-1001 Email: Emily.glunz@morganlewis.com 17 Deborah.davidson@morganlewis.com 18 Attorneys for Defendants 19 20 21 22 23 24 25 26

STIP. MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT - (17-CV-01354 RSM) - 2

## **ORDER** 2 Pursuant to the parties stipulation the due date for Defendants to file responses in this 3 case is extended to October 31, 2017. DATED this 29<sup>th</sup> day of September 2017. 4 5 6 7 8 CHIEF UNITED STATES DISTRICT JUDGE 9 10 Presented By: 11 12 FOX ROTHSCHILD LLP 13 14 By <u>/s/ Laurence A. Shapero</u> Laurence A. Shapero, WSBA #31301 15 Robert M. Howie, WSBA #23092 Attorneys for Defendants 16 17 By /s/ Arlene M. Brown (with permission)\_ 18 Arlene M. Brown, Pro Se 19 **Plaintiff** 20 21 22 23 24 25 26